

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Western Massachusetts Electric Company	)
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2002 Rate Change Filing	)
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D.T.E. 01-101

**PETITION TO INTERVENE AND PROTEST OF SCHWEITZER-MAUDUIT  
INTERNATIONAL, INC.**

Schweitzer – Mauduit International, Inc., (“SMI”) hereby petitions for leave to intervene and participate in the above-entitled proceeding in accordance with 220 CMR § 1.03.

In support of its request SMI states as follows:

- 1) Schweitzer – Mauduit International, Inc., (“SMI”) is a Delaware corporation with a principal executive office in Alpharetta, Georgia. SMI owns a large paper plant in Lee, Massachusetts and has a distribution service load of approximately 12 MW on the Western Massachusetts Electric Company (“WMECO”) system.
- 2) SMI is currently served under a contract approved by the Department where a portion of its load is served under Rate T-2 and a portion under Rate I-1. This contract has a term which ends on November 1, 2003.
- 3) During August – October, 2001 SMI investigated the possibility of taking generation supply service from a competitive supplier. In order to understand the potential impact of going from a contract customer with generation supply served by WMECO to a Rate T-2 customer served by a competitive supplier SMI asked WMECO to provide a bill analysis. This analysis was provided to SMI by an account executive of WMECO.
- 4) In reliance on the analysis by WMECO SMI made a decision to sign a generation supply contract with a competitive supplier to become effective on January 1, 2002. Based on the information provided by WMECO and the proposed competitive supplier price SMI established its electricity budget for 2002.
- 5) In this proceeding, and without justification or explanation, WMECO has proposed to increase the transition charge recovery from 0.535 cents per kilowatt-hour to 1.357 cents per kilowatt-hour. This proposed change in transition cost recovery will cause a major unexpected and unwarranted increase in the budgeted electric expenses of SMI.

It will cause rate shock for SMI and other customers that are served by competitive energy suppliers.

- 6) In docket DTE 00-110 when the current transition charge was established WMECO stated that the charge was set at “a level that provides for full recovery of all principal and interest costs associated with the anticipated issuance of WMECO’s rate reduction bonds (RRBs) (see D.T.E. 00-40). In addition, this rate will also enable the recovery of all other non-securitized regulatory assets over the twelve-year period of the RRBs. This recovery does not result in additional deferrals, but is accomplished through realigning the amortization to a twelve-year period.”
- 7) WMECO has provided no justification that should allow an increase in transition cost recovery where a customer has reasonably relied on the current rate recovery period and rate structure.
- 8) SMI will be substantially and specifically adversely impacted by the transition cost recovery proposal of WMECO in this proceeding. No other party can adequately represent the interests of SMI in this proceeding.

WHEREFORE, SMI prays that the Department grant this petition to intervene as a full party and deny the request of WMECO to increase its transition charge recovery for 2002.

Schweitzer-Mauduit International, Inc.  
By its Attorneys,

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Andrew J. Newman  
Rubin and Rudman, LLP  
50 Rowes Wharf  
Boston, MA 02110  
617-330-7000

Dated: December 11, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in these proceedings in accordance with the requirements of 220 CMR 1.05(1)

(Department's Rules of Procedure and Practice).

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Andrew J. Newman

Date: December 11, 2001